



November 20, 2018

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On Monday, November 19, 2018, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Suzanne Yelen of the Wireline Competition Bureau.

During the conversation, NTCA discussed the establishment of robust but reasonable buildout obligations for those entities receiving federal high-cost universal service fund support. NTCA discussed in particular how such obligations had been established previously for small rural local exchange carriers in 2016 and encouraged use of a comparable framework for any revised obligations in the future. *See Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, 3151-52 (2016), at ¶¶ 169-170. NTCA noted, however, the need to ensure that any such framework would be appropriately updated to reflect the increased costs associated with deployment of higher-speed networks, particularly in lower-density rural areas.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the rules of the Federal Communications Commission, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President –
Industry Affairs & Business Development

cc: Suzanne Yelen